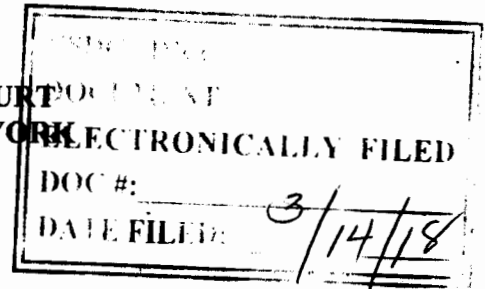


**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**



PAUL VANDERHEIDEN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

UBIQUITI NETWORKS, INC.,
ROBERT J. PERA, KEVIN RADIGAN,
CRAIG L. FOSTER, and MARK SPRAGG,

Defendants.

No. 1:18-CV-01620-VM
Rel. 1:18-CV-01841-VM

**STIPULATION AND [PROPOSED]
ORDER**

WHEREAS, on February 21, 2018, the Plaintiff Paul Vanderheiden ("Plaintiff") filed a class action complaint asserting claims against Defendant Ubiquiti Networks, Inc. ("Ubiquiti") and Defendants Robert J. Pera, Kevin Radigan, Craig L. Foster, and Mark Spragg (the "Individual Defendants"), pursuant to Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder by the SEC;

WHEREAS, the case has been assigned to Judge Victor Marrero and Magistrate Judge James L. Cott;

WHEREAS, the complaint in this action is governed by the provisions of the Private Securities Litigation Reform Act (the "PSLRA") that provides for a specific process for the appointment of lead plaintiff(s) and lead counsel to represent the putative class;

WHEREAS, on February 22, 2018, Plaintiff published a notice advising members of the purported class of the pendency of the action and that, not later than April 23, 2018, any member of the purported class may move the Court to serve as lead plaintiff of the purported class;

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the Plaintiff and the attorneys for Ubiquiti and the Individual Defendants, as follows:

1. Undersigned counsel for Ubiquiti and the Individual Defendants are authorized to accept, and hereby do accept, service of the summons and complaints in the above-captioned action on behalf of Ubiquiti and the Individual Defendants, without prejudice and without waiver of any of Ubiquiti's and the Individual Defendants' defenses, objections or arguments in this matter or any other matter, except as to sufficiency of service of process.

2. Ubiquiti and the Individual Defendants shall not be required to answer or otherwise respond to, and are hereby expressly relieved from answering or otherwise responding to, the complaint in the above-captioned action subject to the provisions of paragraph 4 below.

3. Within ten (10) days after the entry of an order appointing, pursuant to the PSLRA, lead plaintiff(s) and lead counsel in the above-captioned action (or a consolidated action encompassing the above-captioned action), lead plaintiff(s) shall (a) inform Ubiquiti and the Individual Defendants that it intends to serve and file a consolidated class action complaint within sixty (60) days after entry of the order appointing lead plaintiff(s), which shall serve as the operative complaint in the action and shall supersede any other complaints filed in and/or transferred to this Court or (b) notify counsel for Ubiquiti and the Individual Defendants that the original complaint filed by lead plaintiff(s) will be the operative complaint in the action.

4. If lead plaintiff(s) serves and files an amended or consolidated complaint, the deadline for Ubiquiti and the Individual Defendants to respond to that complaint shall be sixty (60) days following service of the amended or consolidated complaint. If lead plaintiff(s) notifies Ubiquiti and the Individual Defendants that the original complaint shall serve as the

operative complaint, the deadline for Ubiquiti and the Individual Defendants to respond to the original complaint shall be sixty (60) days after the lead plaintiff(s) provides such notice.

5. There have been no previous requests for an extension of time for Ubiquiti or the Individual Defendants to move or answer in response to Plaintiff's complaint.

Dated: March 13, 2018
New York, New York

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*Attorneys for Ubiquiti Networks, Inc.,
Robert J. Pera, Kevin Radigan,
Craig L. Foster, and Mark Spragg*

So Ordered this 14 day of March, 2018

[Signature]
Hon. Victor Marrero
United States District Judge

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